

III. Remarks

The undersigned attorney acknowledges and appreciates the courtesy shown by Examiner Beharry during their telephone conference of January 7, 2010. During their telephone conference, Examiner Beharry indicated that the addition of the word “manufacturer” before “model” in independent Claims 4, 21 and 25 and in certain ones of the dependent claims as appropriate would overcome the prior art of record.

Claims 4-14, 21-22, and 25-46 were previously pending. Claims 4, 5, 6, 8, 9, 11, 21, 22, 25, 26, 28, 29, and 31 have been amended. No new matter has been added by the amendments. A Request For Continued Examination is being submitted along with this Response. Reconsideration of Claims 4-14, 21-22, and 25-46 in light of the above amendments and the following remarks is respectfully requested.

Claim Rejections under 35 U.S.C. §102

The Office Action indicated that Claims 4-5, 8-11, and 21-22 were rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent application No. 2002/0073215 A1 to Huitema et al. (“Huitema”). Applicants respectfully traverse the rejection.

Claims 4 and 21

The server in the Internet connection system of Claim 4 requires the limitation of “a model identification section for determining if the client device is of a predetermined manufacturer model and/or the relay device is of a predetermined manufacturer model” (Emphasis added). The relay device in the Internet connection system of Claim 21 requires the limitation of “a model identification section for determining if the client device is of a predetermined manufacturer model” (Emphasis added). With this paper, Claims 4 and 21 have amended by adding the word “manufacturer” in front of the word “model” to clarify the meaning of “model”. Huitema’s device 410 can make determinations on the type of a data packet: the packet being either a non-capsulated IPv4 packet or an encapsulated IPv6 packet. However, Huitema’s device 410 does not make any identification or determination of the manufacturer model of a client device or a relay device or any other device. Therefore, it is believed that Claims 4 and 21 and the claims respectively

dependent thereon (Claims 5-14 and 22) are in condition for allowance.

In the previous response filed on June 22, 2009, the words “wherein the relay device further comprises” were inadvertently deleted from the last paragraph of Claim 21. Applicants are herein amending Claim 21 to restore this original wording.

Claims 5, 9 and 22

The server in the Internet connection system of Claim 5 further requires the limitation of a communication session disconnection section for disconnecting communication sessions or halting transmissions of packets that the server receives if the model identification section determines that the client device or the relay device is not of the predetermined manufacturer model. The server in the Internet connection system of Claim 9 further requires the limitation of a communication session disconnection section for disconnecting communication sessions or halting transmissions of packets that the server receives if a private network environment connected with the client device or the relay device is determined to be not of the predetermined network environment type. The relay device in the Internet connection system of Claim 22 further requires the limitation of a communication session disconnection session for disconnection communication sessions if the model identification section determines that the client device is not of the predetermined manufacturer model.

Huitema does not disclose a communication session disconnection section as claimed in Claims 5, 9 or 22. The IPv4/IPv6 filter device 410 of Huitema does not disconnect or limit transmission of data packets they receive: the IPv4/IPv6 filter device simply strips IPv4 data if a packet is encapsulated IPv6 data and delivers to its destination included in the IPv6 data, and as for non-encapsulated IPv4 packets, the IPv4/IPv6 filter device 410 simply passes them through to respective destination devices. Therefore, it is believed that Claims 5, 9 and 22 are in condition for allowance.

Rejections under 35 U.S.C. §103(a) (Huitema in view of Hovell)

The Office Action indicated that Claims 6, 25, 26, 28-31, 37-40, 43 and 45 were rejected under 35 U.S.C. §103(a) as being unpatentable over Huitema in view of U.S. Patent No. 7,188,191 B1 to Hovell ("Hovell"). Applicants respectfully traverse the rejection of Claims 6, 25, 26, 28-31, 37-40, 43, and 45.

Claim 6

The Internet connection system of Claim 6 requires a server further comprising a command conversion section for converting a command to be sent to the client device to a command in a predetermined manufacturer model specific format to control the client device based on results from the model identification section. The Examiner rejected Claim 6 citing Col. 7, Lines 63 - Col. 8, Line 13 of Hovell. However, the cited section is related to protocol conversion used in Network Address Translation-Protocol Translation, and not related to a conversion of a command for controlling a client device. An example of this command conversion section is explained in paragraph 0099 of the present application: "When a special command is required to manage the IPv6 terminal 2 (client device), the command setup section 22 converts a command included in the communication from the IPv6 server 7 to a command specific to the model." (Emphasis added) As explained above, Hovell does not disclose a command conversion section of Claim 6 and does not supply the required features missing from Huitema, namely, "a model identification section for determining if the client device is of a predetermined manufacturer model and/or the relay device is of a predetermined manufacturer model." Therefore, it is believed that Claim 6 is condition for allowance.

Claim 25

The server of Claim 25 requires the limitation of "a model identification section for determining if the client device is of a predetermined manufacturer model and/or the relay device is of a predetermined manufacturer model" (Emphasis added). With this paper, Claim 25 has been

amended by adding the word “manufacturer” in front of the word “model” to clarify the meaning of “model”. Huitema’s device 410 can made determinations on the type of a data packet: the packet being either a non-capsulated IPv4 packet or an encapsulated IPv6 packet. However, Huitema’s device 410 does not make any identification or determination of the manufacturer model of a client device or a relay device or any other device. As explained above, Hovell does not disclose the model identification section of Claim 25 and does not supply the required features missing from Huitema. Therefore, it is believed that Claim 25 and the claims dependent thereon (Claims 26-46) are in condition for allowance.

Rejections under 35 U.S.C. §103(a) (Huitema in view of Simpson)

The Office Action indicated that Claims 7, 12, 14, 32, 33, 36 and 41 were rejected under 35 U.S.C. §103(a) as being unpatentable over Huitema in view of U.S. Patent No. 6,405,310 B1 to Simpson (“Simpson”). Applicants respectfully traverse the rejection of Claims 7, 12, 14, 32, 33, 36 and 41.

Simpson does not disclose the model identification section claimed in Claims 7, 12, 14, 32, 33, 36 and 41 and does not supply the required features missing from Huitema. Therefore, it is believed that Claims 7, 12, 14, 32, 33, 36 and 41 are in condition for allowance.

Rejections under 35 U.S.C. §103(a) (Huitema-Simpson in view of Tarr)

The Office Action indicated that Claims 13, 34 and 35 were rejected under 35 U.S.C. §103(a) as being unpatentable over Huitema-Simpson in view of U.S. Patent No. 6,978,314 B2 to Tarr (“Tarr”). Applicants respectfully traverse the rejection of Claims 13, 34 and 35.

Tarr does not disclose the model identification section claimed in Claims 13, 34 and 35 and does not supply the required features missing from Huitema-Simpson. Therefore, it is believed that Claims 13, 34 and 35 are in condition for allowance.

Rejection under 35 U.S.C. §103(a) (Huitema-Simpson in view of Zenchelsky)

The Office Action indicated that Claim 42 was rejected under 35 U.S.C. §103(a) as being

unpatentable over Huitema-Simpson in view of U.S. Patent No. 6,233,686 B1 to Zenchelsky ("Zenchelsky"). Applicants respectfully traverse the rejection of Claim 42.

Zenchelsky does not disclose the model identification section claimed in Claim 42 and does not supply the required features missing from Huitema-Simpson. Therefore, it is believed that Claim 42 is in condition for allowance.

Rejection under 35 U.S.C. §103(a) (Huitema-Hovell in view of Zenchelsky)

The Office Action indicated that Claim 44 was rejected under 35 U.S.C. §103(a) as being unpatentable over Huitema-Hovell in view of Zenchelsky. Applicants respectfully traverse the rejection of Claim 44.

Zenchelsky does not disclose the model identification section claimed in Claim 44 and does not supply the required features missing from Huitema-Hovell. Therefore, it is believed that Claim 44 is in condition for allowance.

Rejection under 35 U.S.C. §103(a) (Huitema in view of Zenchelsky)

The Office Action indicated that Claim 46 was rejected under 35 U.S.C. §103(a) as being unpatentable over Huitema in view of Zenchelsky. Applicants respectfully traverse the rejection of Claim 46.

Zenchelsky does not disclose the model identification section claimed in Claim 46 and does not supply the required features missing from Huitema. Therefore, it is believed that Claim 46 is in condition for allowance.

Rejection under 35 U.S.C. §103(a) (Huitema-Hovell in view of Tarr)

The Office Action indicated that Claim 27 was rejected under 35 U.S.C. §103(a) as being unpatentable over Huitema-Hovell in view of Tarr. Applicants respectfully traverse the rejection of Claim 27.

Zenchelsky does not disclose the model identification section claimed in Claim 27 and does not supply the required features missing from Huitema-Hovell. Therefore, it is believed that Claim 27 is in condition for allowance.

V. Conclusion

In view of the foregoing amendment and remarks, it is believed that all of the remaining claims in this application, namely, Claims 4-14, 21, 22 and 25-46, are in condition for allowance. Early and favorable reconsideration is respectfully requested.

A telephone interview is respectfully requested to discuss any remaining issues in an effort to expedite allowance of this application. To that end, the Examiner is invited to contact the undersigned at 972-739-6927.

Respectfully submitted,



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